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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANTHONY J. LUCCA and TONI LUCCA,

Plaintiffs.

vs.

MARY A. SORENSON,

Defendant.

Case No.

COMPLAINT

JURISDICTION

1. Plaintiffs, Anthony J. Lucca and Toni Lucca, reside in the City of Delray, County of Collier, State of Florida, and are citizens of the United States and of the State of Florida at the time of this accident and presently.

2. Defendant, Mary A. Sorenson, resides in the Town of Berlin, County of Camden, State of New Jersey, and is a citizen of the United States and of the State of New Jersey at the time of this accident and presently.

3. The amount in controversy exceeds \$75,000.00.

COUNT ONE

1. On or about November 14, 2011, plaintiff, Anthony J. Lucca, was operating a dump truck which was owned by Barrett Asphalt Corporation and was traveling in an easterly

direction on the White Horse Pike in the Borough of Berlin, County of Camden and State of New Jersey.

2. On or about November 14, 2011, defendant, Mary A. Sorenson, was operating a Chrysler 300, license plate SPN57D New Jersey, and was traveling in a southerly direction on Washington Avenue in the Borough of Berlin, County of Camden and State of New Jersey.

3. On or about November 14, 2011, defendant, Mary A. Sorenson, did in fact proceed through the intersection of Washington Avenue and White Horse Pike in the Borough of Berlin wherein a collision occurred between the vehicle being operated by plaintiff, Anthony J. Lucca, and the vehicle being operated by defendant, Mary A. Sorenson.

4. On or about November 14, 2011, there did in fact exist a traffic control device in the form of traffic lights at the intersection of Washington Avenue and the White Horse Pike as well as Tansboro Road and the White Horse Pike in the Borough of Berlin, County of Camden and State of New Jersey.

5. On or about November 14, 2011, defendant, Mary A. Sorenson, did in fact violate the traffic signals at the intersection of Washington Avenue and the White Horse Pike as well as the intersection of Tansboro Road and the White Horse Pike, resulting in a collision between her vehicle and the vehicle being operated by plaintiff, Anthony J. Lucca.

6. On or about November 14, 2011, defendant, Mary A. Sorenson, was guilty of negligence in the operation and control, among other things, of her motor vehicle, resulting in said vehicle crossing the White Horse Pike directly into the path of the vehicle operated by plaintiff, Anthony J. Lucca.

7. As result of the aforesaid negligence, plaintiff, Anthony J. Lucca, was caused to sustain personal injuries, damages and losses.

WHEREFORE, plaintiff, Anthony J. Lucca, demands judgment against defendant, Mary A. Sorenson, for damages, together with interest and costs of suit.

COUNT TWO

1. Plaintiff, Toni Lucca, hereby repeats and incorporates the allegations contained in Count One as if set forth in full herein.

2. At the time and place aforesaid, plaintiff, Toni Lucca, was and still is the lawful wife of plaintiff, Anthony J. Lucca.

3. As a result of the aforesaid, plaintiff, Toni Lucca, was caused to expend diverse sums of money for the medical care, treatment and attention of her husband, plaintiff, Anthony J. Lucca, and was further deprived of his services, society, companionship and comfort.

WHEREFORE, plaintiff, Toni Lucca, demands judgment against defendant, Mary A. Sorenson, for damages, together with interest and costs of suit.

JURY DEMAND

Trial by jury is hereby demanded as to all issues set forth herein.

COOPER LEVENSON APRIL
NIEDELMAN & WAGENHEIM, P.A.

/s/ Lewis B. April
By: _____

LEWIS B. APRIL
Attorneys for plaintiffs

Dated: September 19, 2012